

E-Filed: February 25, 2014

1 PHILIP A. MCLEOD, CASB No. 101101
 philip.mcleod@kyl.com
 2 JESSICA LUHRŠ, CASB No. 284846
 jessica.luhrs@kyl.com
 3 KEESAL, YOUNG & LOGAN
 A Professional Corporation
 4 450 Pacific Avenue
 San Francisco, California 94133
 5 Telephone: (415) 398-6000
 Facsimile: (415) 981-0136
 6

Attorneys for Defendant JPMORGAN CHASE BANK, N.A., successor by merger to
 7 CHASE HOME FINANCE, LLC

8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**
 10

11 HOAN PHAM,) Case No. CV 13-01843 HRL
)
12 Plaintiff,) STIPULATION TO MODIFY CASE
) MANAGEMENT ORDER AS TO FACT
13 vs.) DISCOVERY CUTOFF; PROPOSED
) ORDER
14 REDLINE RECOVERY SERVICES, LLC;)
15 JP MORGAN CHASE BANK, N.A.; and)
16 CHASE HOME FINANCE, LLC,)
)
Defendants.)

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 18 Plaintiff HOAN PHAM (“Plaintiff”) and Defendants JPMORGAN CHASE BANK, N.A.,
 19 successor by merger to CHASE HOME FINANCE, LLC (“Chase”) and REDLINE RECOVERY
 20 SERVICES, LLC (“Redline”) (collectively, the “Parties”), by and through their respective counsel of
 21 record, hereby stipulate and agree as follows:
 22

23 WHEREAS, on July 31, 2013, this court issued a Case Management Order providing for a fact
 24 discovery cut-off date of January 28, 2014;

25 WHEREAS, the Parties stipulated to extend the fact discovery cut-off date to March 18, 2014,
 26 and the Court issued an Order on that stipulation on January 13, 2014;

1 WHEREAS, the Parties are currently engaged in settlement discussions, and wish to extend the
2 fact discovery cut-off date in order to continue to facilitate those discussions;

3 WHEREAS, the Parties are desirous of changing the fact discovery cut-off date to April 1,
4 2014, with the deadline to respond to written discovery extended to March 17, 2014, and all
5 depositions to be held no earlier than the week of March 17, 2014;

6 WHEREAS, good cause exists to enter an order modifying the fact discovery cut-off date in
7 that it will not affect any other date in the current Case Management Order, including the date of the
8 Pretrial Conference;

9 IT IS HEREBY STIPULATED by and between all Parties to this action through their
10 respective counsel that the fact discovery cut-off date should be reset to April 1, 2014, with the
11 deadline to respond to written discovery extended to March 17, 2014, and all depositions to be held no
12 earlier than the week of March 17, 2014.
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15
16 DATED: February 24, 2014

/s/ Jessica Luhrs

PHILIP A. MCLEOD
JESSICA LUHRS
KEESAL, YOUNG & LOGAN
Attorneys for Defendant JPMORGAN CHASE
BANK, N.A., successor by merger to
CHASE HOME FINANCE, LLC

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21 DATED: February 24, 2014

/s/ James F. Hetherington

JAMES F. HETHERINGTON
GOODMAN NEUMAN HAMILTON LLP
Attorney for Defendant REDLINE RECOVERY
SERVICES, LLC

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1 DATED: February 24, 2014

/s/ Annette D. Kirkham

ANNETTE D. KIRKHAM

FAIR HOUSING LAW PROJECT

LAW FOUNDATION OF SILICON VALLEY

Attorney for Plaintiff HOAN PHAM

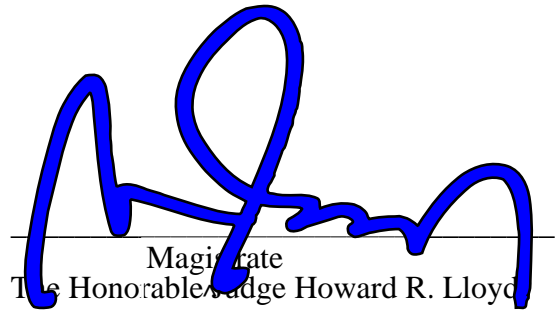
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6 *Filer's Attestation: Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, Jessica Luhrs hereby*
7 *attests that concurrence in the filing of this document has been obtained.*
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~~[PROPOSED]~~ ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED THAT the Case Management Order issued July 31, 2013 should be and hereby is modified to reflect a Fact Discovery Cutoff date of April 1, 2014.

IT IS SO ORDERED.

Dated: February 25, 2014



Magistrate
The Honorable Judge Howard R. Lloyd